



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Planning Team,

RE: CPRE submission : South Oxfordshire and Vale of White Horse Joint Local Plan: Reg 19, Nov 2024

Response ID : ANON-2U66-YGH5-G

CPRE Oxfordshire welcome the opportunity to comment and have submitted a detailed response on the consultation portal. As the portal did not allow for formatting such as italics to indicate a quote, bold to add emphasis and hyperlink provision we also attach below a copy of our response.

CPRE Oxfordshire seek to participate in this hearing in order seek considerations which will improve the protection of the countryside.

We are largely supportive of this Plan and commend the extensive consultation which has been undertaken to produce this Plan, including asking consultees to rank priorities , with “*protecting the countryside*” coming out as the top priority. CPRE Oxfordshire consider that we are best placed to voice areas of concern in relation to this top consultee priority as within our organisation we have experts across all fields in the area of countryside protection.

We have provided detailed policy feedback in our submission but our primary areas of concern relate to a lack of a standalone Green Belt Policy, an omission from the previous Plan and a lack of a clearly defined “Roof top first” approach to Renewable Energy.

Yours faithfully,

Lynda Moore
Planning coordinator CPRE Oxfordshire



Policy/ Para	Challenge	Why we challenge Suggested modification
CE1 sustainable design and construction	Soundness	<p>CPRE consider that the original draft 18 was positively prepared, with due consideration for the climate emergency we face and the need for sustainable development. Elements of this have been removed from this reg 19 document and we wish to see them reinstated.</p> <p>CPRE suggest as a modification that points 3 and 4 from the Reg18 document are reinstated:</p> <p>Reg 18 policy points</p> <p>3) All new development should be built to last. Proposals must demonstrate that they function well and are adaptable to the changing requirements of occupants and other circumstances.</p> <p>4) Proposals for buildings or infrastructure of an outstanding or innovative design which promote high levels of sustainability or help raise the standard of design will, in principle and subject to other material considerations, be supported</p>
CE2 Net zero carbon buildings	Soundness	<p>We wish to see greater clarity and direction than the current wording “<i>the integration of rooftop solar PV will most likely be the most popular choice for new developments.</i>”</p> <p>Instead, we suggest:</p> <p><i>“the integration of rooftop solar PV should be a mandatory requirement unless it can be demonstrated to be inappropriate for the development.”</i></p> <p><i>For example, if it cannot be mounted in a location to collect sunlight.</i></p> <p>We strongly support the overall policy to quantify the level of solar panels as we have seen too many developments with a nominal and inadequate 2 or 4 panels but feel more direction to the above wording will clarify the policy.</p>
CE3 Reducing Embodied Carbon	Soundness	<p>The policy as written gives too much leeway for developers. Greater clarity is required to strengthen the policy.</p> <p>We suggest additional wording: ‘All new developments are encouraged to meet the CE 3 standards by 2030’ (or 2040 if preferred).”</p>
CE5 Renewable Energy	Soundness	<p>The current wording is unsound as it requires associated energy storage and infrastructure, where this may not be applicable, but where it is the whole cumulative development impact that must be considered.</p> <p>Suggested amend:</p> <p>3) Planning applications for renewable and low carbon energy generation and their associated energy storage and distribution infrastructure will be supported, provided that they do not cause significant adverse impacts that cannot be mitigated and are reversible at the end of the life of the</p>



		<p>renewable energy installation, including cumulative and cross-boundary impacts on</p> <p>Replaced by :</p> <p><i>Planning applications for renewable and low carbon energy generation (which must include their associated energy storage and distribution infrastructure where applicable) will be supported, provided that they do not cause significant adverse impacts that cannot be avoided or effectively mitigated, and are reversible within the life of this Plan including cumulative and cross-boundary impacts on:</i></p> <p>CPRE consider that providing a list of what may be impacts may create a restrictive problem . Should this list go forward it should for completeness include:</p> <p>Any Food producing land (in point d) and Local communities impacts including but not limited to residential amenity etc in point j).</p> <p>A more positive statement should also be given consideration for additional inclusion:</p> <p><i>“Solar energy projects will generally be supported where they use new or existing roofs of no heritage significance; car park canopies; derelict brownfield land (such as former landfill sites or worked out quarries, former energy generation or industrial sites) or similar areas of little or no ecological, landscape or heritage significance.</i></p> <p>Additionally for clarity we would like to see inclusion of wording in this policy :</p> <p><i>“the site should be completely cleared when permission no longer exists”</i></p>
para 4.38	Soundness	<p>Unsound : correct grammar for clarity. “Applications for schemes outside of broad areas identified as potentially suitable on the Policies Map” should read:</p> <p><i>“Applications for schemes outside the broad areas identified as potentially suitable on the Policies Map”</i></p>
CE12 Soils and contaminate d lands	Soundness	<p>CPRE support the inclusion of the wording around Wetland and Peatland which has been included since the Reg18 draft. We largely support the wording :</p> <p>Reg 19 says: Protecting and enhancing soils 1) Development should be directed to suitable brownfield land wherever possible. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land (Agricultural Land Classification grades 3b, 4 and 5) should be preferred to those of a higher quality (grades 1, 2 and 3a). Proposals for development on the best and most versatile agricultural land^a must include a soil handling plan and sustainable soil management strategy based on detailed soil surveys.</p>



		<p>However, for clarity and soundness we seek clarity and definition of the word “demonstrated”</p> <p>Such as “ demonstrated to be necessary and not being able to be provided elsewhere”</p>
SP1 Spatial Policy	Soundness	<p>In light of uncertainty of the current NPPF position , with proposed revisions to the Green Belt in the NPPF , it must be made clear which policies apply to the Green Belt in this Plan. To make the plan sound, AN ADDITIONAL STANDALONE GREEN BELT POLICY IS REQUIRED in this Plan as per the wording in current SODC Local Plan, especially as SP2 Settlement hierarchy mentions that there is no settlement boundary defined for Botley, as the Oxforde Green Belt provides a policy limit on development around the settlement.</p> <p>Suggested amend: The current Local Plan Green Belt Policy (STRAT6) should carry forward to this Plan.</p> <p>Para 2 should be changed to reflect there is no change in Green Belt from the previous Plan to this one and the reference to the NPPF should be the December 2023 version (under which the Plan is being Examined)</p> <p>Para 8 Development in the countryside, including areas outside of existing built-up areas, will not be appropriate unless specifically supported by other relevant policies as set out in the development plan or national policy, for example we will support rural exceptions site housing and rural workers’ dwellings to come forward.</p> <p>Modify to :</p> <p>Development in the countryside, including areas outside of existing built-up areas, will not be appropriate unless specifically supported by other relevant policies as set out in the development plan or national policy, for example we will support rural exceptions site housing and rural workers’ dwellings to come forward where a need has been identified.</p>
SP2 Settlement hierarchy	Soundness	<p>CPRE consider this policy unsound as there is lack of consistency over terminology and further considerations which need to be included.</p> <p>To ensure inclusion and for clarity we propose an additional consideration for all development, with wording as follows:</p> <p><i>“All new development within, adjacent to, or extending existing settlements shall have regard to conserving the historic character of the place in terms of building design and layout / form.”</i></p> <p>For clarity greater definition of the word subdivision in specific cases is needed.</p>



		<p>The glossary says “Subdivision - The subdivision of an existing residential building.</p> <p>Subdivision must be consistent across all cases; it is referred to as follows:</p> <p><i>Why then does SP2 Tier 2 settlement say:</i> Within the built-up area^a of these settlements: brownfield development, infill development, backland development, replacement dwellings or subdivision^b is appropriate in principle (where b= Subdivision of a building rather than a plot).</p> <p><i>And Tier 3 says</i> Within the built-up area of these settlements: brownfield development, infill development, replacement dwellings or subdivision is appropriate in principle.</p> <p><i>And Tier 4 says</i> Within the built-up area of these settlements: development is limited to brownfield sites, replacement dwellings or subdivision. As opposed to Reg 18 which said. Within the built-up area of these settlements: development is limited to brownfield sites, replacement dwellings or subdivision where appropriate.</p> <p>CPRE seek definition and clarity that sub-division here means of buildings, converting big houses into flats of a number of completely separate dwellings – a definition CPRE would support.</p> <p>We also seek for clarity and soundness additional wording in each case after the wording ‘in principle’ with: <i>“provided that due regard is had to the historic character of the place .”</i></p>
<p>SP4-9 Added for each</p>	<p>Soundness</p>	<p>This strategy fails to mention the Oxfordshire Rights of Way Improvement Plan which includes Aspirational Access Networks that should feed into the Market Town Strategies. https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/countryside-access/rights-way-management-plan</p> <p><i>All large-scale allocations AS1-10 mention enhancements to the Public Rights of Way, so why don't the Market Town Strategies?</i></p> <p>For soundness each Market Town Policy should include a policy to “seek enhancement to the Public Rights of Way network for all users on and off-site.”</p>
<p>HOU10 – Meeting the needs of Gypsies, Traveller & Travelling Showpeople</p>	<p>Soundness</p>	<p><i>Submission note: Despite numerous attempts we were unable to enter comment on this Policy on the portal and so added this comment by Chapter and Page number</i></p> <p><i>CPRE consider Policy HOU10 unsound as there is a lack of consistency between this and Rural Exception sites</i></p>



		<p><i>This wording from HOU12 should also be included on this policy, especially points e and f:</i></p> <p>Policy HOU12 – Rural and First Homes exception site includes: e) they have no unacceptable impact on amenity, character and appearance, environment or highways; which we consider for clarity should be altered to : e) <i>they have no unacceptable impact on the existing built environment, its residents or their health and well-being or its amenities, character and appearance, natural environment (habitats, air, water, soil quality, and biodiversity) or highways.</i></p> <p>and f) they do not form an isolated development and have access to local services and facilities; and ...</p>
<p>HOU12 – Rural & First Homes exception sites and</p>	<p>Soundness</p>	<p>This policy is unsound as it is not quantified and inconsistent with HOU13</p> <p>HOU12 The councils will grant planning permission for affordable housing proposals on rural exception sites where: & 2) Proposals for First Homes exception sites will be permitted where:</p> <p style="padding-left: 40px;">d) the proposed development is of size and scale commensurate with the scale and character of the settlement they are within or adjacent to and the established local housing need.</p> <p>HOU13 1) The council will grant planning permission for small sites for community-led affordable homes where: b) it is proportionate in scale to the settlement they are adjacent to or within, not exceeding: i) 5% of the number of dwellings in the existing settlement; and ii) 1 hectare in size.</p> <p>In Reg 18 both policies used the HOU13 wording and HOU12 should REVERT to this for consistency</p> <p>CPRE also seek a further condition that <i>“it conserves or enhances the historic character of the place”</i></p> <p>We suggest the following amendment to point e for soundness:</p> <p>e) they have no unacceptable impact on amenity, character and appearance, environment or highways; which we consider for clarity should be altered to : e) <i>they have no unacceptable impact on the existing built environment, its residents or their health and well-being or its amenities, character and appearance, natural environment (habitats, air, water, soil quality, and biodiversity) or highways.</i></p>



<p>HOU16 Residential extensions and annexes</p>	<p>Soundness</p>	<p>CPRE consider this this policy is not sound without stating a clearly quantifiable amount.</p> <p>Wording from Reg18</p> <p>1 c) within the Green Belt, and within the countryside*, the extension or the alteration of a building would be no greater than 40 percent of the volume of the original dwelling**;</p> <p>has been replaced with</p> <p>1 c) within the Green Belt, and within the countryside, the extension or the alteration of a building does not result in disproportionate additions over and above the size of the original dwelling^b;</p> <p>The NPPF only states “154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</p> <p>So, there is no actual limit and general weakening of the wording and this is unsound.</p> <p>We should look to adopt the approach from other councils who have a clear policy - https://moderngov.threerivers.gov.uk/documents/s9654/Appendix+2+-+Development+in+the+Green+Belt+Appendix.pdf</p> <p>https://consult.bracknell-forest.gov.uk/portal/planning/draft_bracknell_forest_local_plan?pointId=s15129940907654</p> <p>We argue this a further reason for a Green Belt policy as in the existing SODC Plan, or at least a Green Belt Supplementary planning document https://guildford.gov.uk/article/26970/Green-Belt-Supplementary-Planning-Document</p> <p>CPRE strongly support an ADDITIONAL POLICY ON THE GREEN BELT, covering development in the Green Belt.</p> <p>Failing this as a minimum for clarity and soundness a further clause should be provided relation to the Green Belt. <i>“in the case of the Green Belt an Article 4 Direction will be applied to limit the scale of extension under permitted development rights to an additional 40% of the size of the existing dwelling and any ancillary buildings. Extensions above this figure will require full planning permission, to be determined in accordance with the NPPF policy and legal precedent”</i></p>
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AS1 – Land at Berinsfield Garden Village	Soundness	<p>CPRE consider this development unsound for reasons we raised in our response to Reg 18 concerning the amount of ‘green infrastructure’ that has been removed from the Green Belt.</p> <p>The Green Belt Study states Green Belt 3.21 There is sufficient land within the districts to provide to provide for the Councils’ identified housing needs and the agreed unmet need, therefore there is no justification for the release of new areas of Green Belt for development, although new planned parkland at Dalton Barracks will be within the Green Belt.</p>
AS2 – Land adjacent to Culham Science Centre	Soundness	<p>CPRE consider this development unsound for reasons we raised in our response to Reg 18 concerning the amount of ‘green infrastructure’ that has been removed from the Green Belt.</p> <p>The Green Belt Study states Green Belt 3.21 There is sufficient land within the districts to provide to provide for the Councils’ identified housing needs and the agreed unmet need, therefore there is no justification for the release of new areas of Green Belt for development, although new planned parkland at Dalton Barracks will be within the Green Belt.</p>
DE4 Densities	Soundness	<p>CPRE consider this policy unsound as it is unambitious and not in line with the PAZCo 2021 report.</p> <p>CPRE advocates a density target in urban settings of 70 dwelling per ha. The target in the plan of 45 dwelling per ha is unambitious and does not take into the account the design setting of dwellings at density. CPRE supports the PAZCo report of 2021 which references on P149: “ <i>Minimising the footprint of all new development by optimising housing density while also building in connected green and blue spaces. In typical urban extensions, housing densities of 60 dwellings per hectare should be possible with good design, use of mid-rise 3 and 4-storey dwellings, compact developments with a variety of services and amenities, and a shift away from private car ownership towards more active travel, public transport and shared car use to minimise land needed for car parking.</i>”</p> <p>CPRE suggests an amendment of paragraph 3, on page 285 from:</p> <p><i>Sites well related to higher tier settlements (Tier 1 and 2) and served by public transport, or with good accessibility by foot or bicycle to town centres or a district centre within Oxford City, should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of more than 45 dwellings per hectare (net) unless there is a clear conflict with delivering a high quality design or other clearly justified planning reasons for a lower density.</i></p>



		<p>To</p> <p><i>Sites well related to higher tier settlements (Tier 1 and 2) and served by public transport, or with good accessibility by foot or bicycle to town centres or a district centre within Oxford City, should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of a target of 70 dwellings per hectare (net) unless there is a clear conflict with delivering a high quality design or other clearly justified planning reasons for a lower density.</i></p> <p>In addition CPRE seek a modification of an additional bullet point on the historical nature of pattern settlement : All proposals for new development should have regard to historic patterns of nucleated or dispersed settlement. This should take account of the historic (pre 1930) character and form of towns and villages in the locality which remain popular places to live.</p>
HP6 – Green infrastructure on new developments	Soundness	<p>CPRE consider this policy unsound as it introduces a new term “ greening” which is not defined.</p> <p>This policy contains a new point from reg 18:</p> <p style="padding-left: 40px;">4) Existing green infrastructure should be enhanced where appropriate and practicable, through measure such as the greening of Public Rights of Way and other active travel routes and the protection and strengthening of existing hedgerows and tree belts.</p> <p>We challenge soundness as there is no definition of “greening” of PRowS. It is clear this is a new terminology/ category and for soundness definition must be provided. Planting of hedges – can make them impassable. OCC currently struggles to clear all current paths of overgrown vegetation/fallen trees. Would this be the responsibility of the landowner / developer / land management company? OR by saying “should be enhanced” mean promoting higher status to give greater access & increase safe routes of travel for vulnerable users (equestrians & cyclists, wheelchair users). CPRE are concerned that this could impact on open views across the countryside.</p>
NH4 – Chilterns and North Wessex Downs National Landscapes	Soundness	<p>CPRE consider that this policy is less comprehensive in terms of the tests required for a major development than the major development policy in the NPPF and therefore unsound.</p> <p>This policy should be aligned with the two National Landscape Management Plans and commit the councils to work with the National Landscapes’ Council Board.</p> <p>CPRE propose:</p> <p style="padding-left: 40px;">2) Major development will only be permitted in the National Landscapes in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, that alternative locations (outside the National Landscape) have been considered and excluded, and that any detrimental effect on the environment, the landscape and recreational opportunities will be minimised and mitigated.</p>



		Be replaced with : <i>2) Major development will only be permitted in the National Landscapes in exceptional circumstances, in accordance with the tests set out in the NPPF and the policies set out in the relevant Management Plan, and also in consultation with the Council of Partners or Board as the case maybe.</i>
NH6 – Landscape (was NH5 Landscape)	Soundness	This policy has gone from Strategic to non-Strategic. CPRE challenge this and query if this is an error in on Appendix 2 Strategic Status of Policies. The natural landscape must remain a strategic priority.